

Bell Atlantic
1300 I Street N.W.
Suite 400 West
Washington, DC 20005
202 336-7824 Fax 202 336-7922
E-Mail: Dolores.A.May@BellAtlantic.com

Dee May
Director
Federal Regulatory Affairs

RECEIVED

NOV 24 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE OR LATE FILED



November 24, 1999

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 99-295: In the Matter of Application of Bell Atlantic Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in New York

Dear Ms. Salas,

This responds to a number of OSS-related issues raised by commenters for the first time in their reply comments, to which Bell Atlantic has not had an opportunity to respond. Therefore, the 20 page ex parte limit does not apply to this ex parte.

1. **Pre-Order Response Times:** Both AT&T and MCI WorldCom complain about Bell Atlantic's pre-order response times. But these carriers are trying to blame Bell Atlantic for problems they are experiencing on their own side of the pre-ordering interface.

MCI WorldCom expands on its original claim of overly long response times, and now claims that parsed CSR response times are 15-20 seconds during the day and 20-40 seconds at night when volumes are higher. (MCI Comments at 18-19.) Bell Atlantic has worked closely with MCI WorldCom to try to resolve this issue. Bell Atlantic has discovered that the main cause of the problem is actually in MCI WorldCom's system and their technical experts have confirmed this analysis. MCI WorldCom's system will not accept responses from Bell Atlantic faster than one every 2.3 seconds (about 1400 per hour). MCI WorldCom actually sends transactions to Bell Atlantic at much greater volumes, which causes the responses to queue up in Bell Atlantic's system waiting until MCI WorldCom's system is ready to accept the next response. In other words, while Bell Atlantic's systems are capable of handling current and future volumes, MCI WorldCom's own systems are not. Because response times are measured when the response actually leaves Bell Atlantic's system, and the responses do not leave Bell Atlantic's system until MCI WorldCom's system is ready to accept them, this has stretched out response times greatly. The queues caused by MCI

No. of Copies rec'd 0+1
List ABCDE

WorldCom's system design also affect response times for any other CLECs using the same ECXPert box as MCI WorldCom. To minimize this problem for other CLECs, Bell Atlantic has tried to isolate MCI WorldCom's transactions in one box and has asked other CLECs to use the other ECXPert box.

AT&T complains about the response times it is experiencing for the CORBA interface (Crafton/Connolly Reply Decl. ¶ 38). Bell Atlantic has begun to measure response times for CORBA pre-order transactions in November. To date, the average response times are 3.43 seconds for address validation transactions and 5.74 seconds for parsed CSR – both well within the standards established by the New York PSC in the Carrier-to-Carrier proceeding. As explained in its Reply Comments (see Miller/Jordan/Zanfini ¶ 21), Bell Atlantic has no ability to measure, and no control over, what happens on AT&T's side of the firewall, but Bell Atlantic has identified a number of problems inside AT&T's own applications. It appears, therefore, that the response times reported by AT&T are the result of issues within its own systems, not problems with Bell Atlantic's interface or OSS.

2. Interface Stability: MCI WorldCom also complains that since October 19, when it filed comments, the pre-ordering interface “has gone down almost daily.” MCI Reply Comments at 19-20. This also is caused by the problem in MCI WorldCom's system (described above), and not – as MCI WorldCom claims – from an inadequacy of Bell Atlantic's interface. When the queues (caused by MCI WorldCom's inability to take delivery of the responses provided by Bell Atlantic) build up to a large size, the software in Bell Atlantic's system must be re-cycled to clear the queues. Basically, this means that the ECXPert box must be shut down and restarted to keep the system from crashing.

AT&T also claims that the CORBA pre-order interface has suffered a number of outages in October and November. Crafton/Connolly Reply Decl. ¶ 34. Bell Atlantic was unaware of these outages, and has not previously been notified of them by AT&T. Perhaps not coincidentally, however, AT&T called Bell Atlantic the day before each of the cited incidents to inform Bell Atlantic that AT&T was having problems with its own systems. Overall, the CORBA pre-ordering interface has been very stable.

MCI WorldCom raises several complaints about Bell Atlantic's rollout of the new enhanced version of the Web GUI (GUI III). According to MCI WorldCom, Bell Atlantic “unilaterally” decided to move to the GUI III, which was inadequately tested. MCI Reply Comments at 15, 17. MCI WorldCom complains that it has had difficulty logging in, that it has experienced long response times and frequent unavailability of Internet access, and that it is concerned with the functionality of the GUI III. Id. at 16.

MCI WorldCom's claim of inadequate testing is pure regulatory posturing on its part. Starting over the summer Bell Atlantic conducted nearly four months of

Beta testing for GUI III which was open to CLECs. The roll-out plans for GUI III were carefully worked out with the industry and Bell Atlantic has fixed all issues that came up through the test. MCI WorldCom, chose largely to ignore the Beta test and only began bringing up their issues when the application moved to production. As Bell Atlantic explained in its ex parte dated November 22, Bell Atlantic recently met with MCI WorldCom to review the functionality of both GUI II and GUI III. MCI WorldCom has closed its issues concerning functionality and is no longer raising concerns about its ability log in. Finally, the Internet access to the GUI is the same access provided to retail customers. Bell Atlantic is continuing to work on improving Internet availability and response times, and has extended the transition period during which CLECs can use either GUI II or GUI III to ensure a smooth transition.

2. Provisioning: MCI WorldCom claims that many orders for PIC changes are dropping to manual processing after they have been provisioned but before they clear the billing system, which appears to be causing missing completion notices. MCI Reply Comments at 10, n. 14 and Lichtenberg/Sivori Reply Decl. ¶ 21. Although MCI WorldCom implies that this is a flow through issue, it is not. As is clear from MCI WorldCom's description, these orders have already been entered into the Service Order Processor, and provisioning has been completed. For those orders, Bell Atlantic has sent the provisioning completion notice (implemented in August) to MCI WorldCom. If, as sometimes occurs for both retail and CLEC end users, there is a discrepancy between the order and Bell Atlantic's billing records, the discrepancy must be resolved by human intervention before the billing records can be updated. In this instance, the billing completion notice is sent to the CLECs once the billing records have been updated.

RCN claims that on PIC changes for an RCN resale customer, Bell Atlantic has disconnected the current long distance carrier without simultaneously connecting a new long distance carrier, leaving the end user unable to make long distance calls. RCN Reply Comments at 9. RCN has not previously raised this issue with Bell Atlantic, and its comments and accompanying affidavit provide no details. RCN's description of the issue is contrary to the way such orders are processed by Bell Atlantic's systems. Bell Atlantic's systems simultaneously disconnect the prior PIC and connect the new one. Bell Atlantic has attempted to contact RCN to understand RCN's concern.

3. Billing Usage: AT&T claims that Bell Atlantic is not providing usage for originating toll free calls made by AT&T's customers. Crafton/Connolly Reply Decl, ¶ 100. AT&T is simply wrong. AT&T has been receiving originating 800 service messages on the Daily Usage File (DUF) formatted as regular access records (i.e. record type 11-01-01). This usage can be easily identified because the terminating number begins with "800". Effective with the November release, BA began formatting these messages as unique 800 terminating message records (i.e. record type 11-01-25), thus separating these

messages from other access data. Moreover, contrary to AT&T's allegation, Bell Atlantic has discussed these issues in the collaborative sessions.

AT&T also claims that Bell Atlantic has failed to provide "settlement codes" on unbundled element records, and to provide "Category 1" billing records for operator-assisted, collect, third party, and directory assistance calls. Crafton/Connolly Reply Decl. ¶¶ 101, 102. Settlement codes are used to classify whether a call is intrastate, interstate, or international. AT&T has the same information available to it as Bell Atlantic does. On its retail records, Bell Atlantic compares the originating and terminating numbers to determine the classification of the call, but this is not done until the downstream rating process, when the cost of the call is calculated. A CLEC can make the same determination by comparing the originating number to the terminating number when it rates the call for purposes of billing its end user. Although usage records have been exchanged among carriers for many years, no carrier has asked for the settlement codes until recently, because the carriers have all the information they need without the code. Nevertheless, Bell Atlantic will begin populating the settlement code with the February release. Moreover, Category 1 billing records have been discussed with the CLECs in the collaboratives.

4. Change Management: MCI WorldCom complains that Bell Atlantic has not yet answered its questions about the types of services not covered by the parsed CSR, or the schedule for development of parsed CSR for ISDN. MCI Reply Comments at 20. As explained in the Reply Comments, BA-NY has from the beginning communicated clearly that the parsed CSR functionality at this time covers non-complex services, and does not cover complex services, including ISDN. Miller/Jordan/Zanfini Reply Decl., ¶ 22. On November 8, Bell Atlantic sent additional information to the CLECs through the Change Management process. A copy of that notice is attached to this letter. Finally, MCI WorldCom had questioned whether the parsed CSR covered Lifeline service. In further tests of the parsed CSR functionality, Bell Atlantic's system has successfully returned a parsed CSR for a Lifeline account.

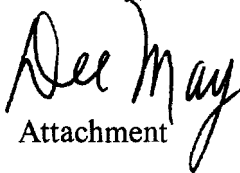
MCI WorldCom also claims that the percentage of emergency notices sent on time declined in September from August results. MCI Reply Comments at 12. Like MCI WorldCom's earlier claim about timeliness of Type 4 changes (see Miller/Jordan/Zanfini Reply Decl., ¶ 79) this is primarily an issue of small sample sizes. In addition, certain reported misses were misclassified. In September, there were 12 emergency notices, of which five were classified as misses. One of those should not have been counted at all, since it had no bearing on the New York systems. None of the remaining four items were reported as a problem by a CLEC. Two of the items addressed minor changes to the business rules and did not result in any system changes. A third item dealt with a transaction that would rarely be used – the exchanging of previously reserved preferred telephone numbers (Gold Numbers) for other preferred numbers. The last item dealt with information returned when a telephone number is requested at a premises that

already has working service. Three of these items were discovered during attestation reviews with KPMG in Pennsylvania and the fourth was discovered by Bell Atlantic. Bell Atlantic's policy is to provide immediate notification of discrepancies between documentation and systems, even if the documentation discrepancy is very minor in nature. Such a notification, however, does not necessarily indicate that CLECs were negatively affected.

5. Uniform Interfaces: AT&T and others argue that Bell Atlantic has failed to comply with its commitment to implement uniform interfaces for access to OSS within 15 months of the Bell Atlantic/NYNEX merger. Crafton/Connolly Decl. ¶ 99 n. 55; Crafton/Connolly Reply Decl. ¶ 55. See also ALTS Reply Comments at 20-21; Rhythms Reply Comments at iii. As an initial matter, this claim is simply irrelevant to whether Bell Atlantic has met the requirements of §271 in New York. As a factual matter, these commenters are simply incorrect. Bell Atlantic met the requirement to deploy uniform interfaces for pre-ordering, ordering, maintenance and repair, and billing throughout the region within 15 months of merger approval. Claims to the contrary were based on arguments that the information submitted over the interfaces and the format of that information varied from state to state as a result of different regulatory requirements and different internal systems. Bell Atlantic is working with the CLECs to bring greater uniformity to the formats and information that are submitted over the interfaces, but neither the existence of the complaint noted by AT&T nor the ongoing work with the CLECs is evidence that Bell Atlantic failed to comply with its merger commitments.

Please contact me if you have any questions.

Sincerely,


Attachment

Cc: A. Kearney
J. Rosenworcel
E. Einhorn
J. Mikes
J. Patterson

Bell Atlantic Parsed Customer Service Record Transaction Overview

This transaction returns the requested Customer Service Record data to the customer. The CSR information is returned in the MLT field when the PARSEIND field = 'N' on the inquiry. The CSR information is returned in Parsed CSR fields when PARSEIND field = 'Y' on inquiry.

The Bell Atlantic Parsed CSR transaction is intended for non-complex accounts. The transaction supports POTS accounts and currently does not support complex accounts including ISDN and Centrex accounts.

The Service & Equipment sections are parsed based on OBF Local Customer Service Inquiry (CSI) Preparation Guide rules. The listed name and address fields which are encompassed in the listing section are a part of the transaction response and are parsed as indicated in the CSI. The service address information is also included in the Parsed CSR. The Remarks and Billing Sections that are not part of OBF CSI will not be available. Additional Listing information is not being included in the Parsed CSR transaction.

Since the Bell Atlantic Parsed CSR transaction as of the Business Rules 2.5.1 version is based on OBF 1269 (LSOG 4)¹ requirements, any USOC/FID that has not been explicitly defined in OBF 1269 (LSOG 4) will be mapped to Feature Code/Feature Detail fields within the related TN group.

The Parsed CSR will return three types of responses:

1. 1269 data elements will be returned in Individual fields.
2. Non 1269 fields will be returned in Feature Code/Feature Detail fields and an accompanying message will be generated.
3. An error message will be generated when a CSR cannot be parsed.

Currently, Parsed CSR is only valid for EDI. The Parsed CSR transaction will return Concatenated as well as Parsed fields.

¹ OBF Issue 1269 has been accepted into the OBF LSOG 4 Industry Standards as a part of the 122 Practice. This will be reflected in Business Rules version 4.1.